

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

HACHETTE BOOK GROUP, INC.,
HARPERCOLLINS PUBLISHERS LLC,
JOHN WILEY & SONS, INC., and
PENGUIN RANDOM HOUSE LLC
Plaintiffs,

v.

INTERNET ARCHIVE and DOES 1 through
5, inclusive
Defendants.

Case No. 1:20-CV-04160-JGK

DECL. OF TRACY OFFNER

I, Tracy Offner, declare as follows:

1. I am a Vice President at the Analysis Group, Inc. (“Analysis Group” or “AG”). The statements made in this declaration are based on my personal knowledge. If called to testify as a witness, I would testify as follows:

2. I have a bachelor’s degree in Economics from Boston College and a Master of Business Administration from The Tuck School of Business at Dartmouth College. I have over 10 years of experience at the Analysis Group.

3. Analysis Group is one of the largest international economics consulting firms, with more than 1,000 professionals across 14 offices in North America, Europe, and Asia. Since 1981, AG has provided expertise in economics, finance, health care analytics, and strategy to top law firms, Fortune Global 500 companies, and government agencies worldwide.

The Project

4. The plaintiffs in this case, through counsel, engaged the Analysis Group to gather certain evidence in May 2020 as to the books listed in Attachment A to this declaration. Attachment A to

this declaration lists the same books that are listed in Exhibit A to the Complaint that plaintiffs filed on June 1, 2020.

5. The Analysis Group completed this project in May 2020. I led the project, while receiving internal administrative support. The Analysis Group was compensated based on its time incurred on the project. Attachment A to this declaration lists URLs (the “URLs”) at the website www.archive.org (“IA website”) from which the Analysis Group gathered the evidence.

6. We created four user accounts on the IA website, using 4 different email addresses. The accounts were free to create and use. These accounts were the standard accounts at the IA website, rather than a specially qualified account held by someone with a print disability. For organizational purposes, we created one account per plaintiff. We also downloaded the free Adobe Digital Editions software from the website <https://www.adobe.com/solutions/ebook/digital-editions/download.html>. Using these accounts, we clicked on the URLs on Attachment A. Once on those pages on the IA website, we “borrowed” the books, downloaded copies, and created screenshots along the way. We performed this work within the United States.

The Specific Steps

7. Starting at each URL, we performed a series of steps. I describe the steps in the paragraphs that follow. Next to each step, I list the bates number for the document that reflects the records that we gathered during that step. Initially, and for illustrative purposes, I list just the records for a single book. This is the IA details page for the book entitled *The Innocent Man* by John Grisham, beginning at Bates AG0002833 with the URL <https://archive.org/details/innocentmanmurdegri00gris>. In the next section of my declaration, I cite the bates numbers on a book-by-book basis. Any exceptions with respect to the steps undertaken for a particular book are listed below.

8. First, for each URL, we clicked the link and were taken to the Internet Archive “details” landing webpage (“IA details page”) for that book. While on the IA details page, we clicked the “show more” button and captured a copy of the webpage via print to PDF. See Attachment B.

9. Second, while on the IA details page, we clicked the URL link associated with “Openlibrary_work.” We captured a copy of the Open Library webpage page via print to PDF. See Attachment C.

10. Third, for each work captured, we returned to the IA details page. We captured a copy of the “About this book” tab via a screen shot and saved a PDF copy. See Attachment D.

11. Fourth, we clicked the “Borrow” button and the IA website provided us access to the full book for 14 days. We captured a copy of the webpage via print to PDF. See Attachment E.

12. Fifth, with access to the full book once “borrowed,” we then took the following steps offered by the IA website:

- a. We scrolled through the entire book within the IA website’s online book-reader interface.
- b. We utilized the listen feature, called “Read this book aloud,” of the IA website’s online book-reader interface to hear an audio rendering of the book. We listened to portions of the book, not the entirety.
- c. We used the download feature to download the full book from IA’s website, for access on our computers using Adobe Digital Editions. The download feature allowed for downloads in both PDF and ePUB formats.

13. Sixth, we captured copies of a series of pages of the book that we had downloaded for reading in the PDF format via Adobe Digital Editions (rather than via the IA website’s online

book-reader interface). We captured each of these pages via a screen shot and saved a PDF copy, including:

- a. A copy of the front cover of the book. See Attachment F.
- b. A copy of the digitization page. See Attachment G.
- c. A copy of the rights page of the book. See Attachment H.
- d. The title page of the book. See Attachment I.
- e. Page 32 of the book. See Attachment J.
- f. The last page of the book. See Attachment K.

Book-by-Book Records

14. We performed this same process for each Work in suit. In this section of my declaration, as to the process I just described, I now cite the specific records we captured for each book.

15. For URL, <https://archive.org/details/psiloveyou00aherx>, this is the IA details page for the book entitled *PS, I Love You* by author Cecelia Ahern. The bates numbers for the documents gathered pursuant to the steps described above are AG0000004 to AG0000028.

16. For URL, <https://archive.org/details/simonvshomosapie0000albe>, this is the IA details page for the book entitled *Simon vs. The Homo Sapiens Agenda* by author Becky Albertalli. The bates numbers for the documents gathered pursuant to the steps described above are AG0000995 to AG0001020.

17. For URL, https://archive.org/details/oneonlyivan0000appl_z2y5, this is the IA details page for the book entitled *The One and Only Ivan* by author Katherine Applegate. The bates numbers for the documents gathered pursuant to the steps described above are AG0001021 to AG0001045.

18. For URL, <https://archive.org/details/shipbreakernovel00baci/mode/2up>, this is the IA details page for the book entitled *Ship Breaker* by author Paolo Bacigalupi. The bates numbers for the documents gathered pursuant to the steps described above are AG0000065 to AG0000098.

19. For URL, <https://archive.org/details/daringgreatlyhow0000brow>, this is the IA details page for the book entitled *Daring Greatly* by author Brené Brown. The bates numbers for the documents gathered pursuant to the steps described above are AG0002448 to AG0002470.

20. For URL, <https://archive.org/details/goldenson0000brow>, this is the IA details page for the book entitled *Golden Son* by author Pierce Brown. The bates numbers for the documents gathered pursuant to the steps described above are AG0002471 to AG0002493.

21. For URL, https://archive.org/details/bestkeptsecrets00brow_0, this is the IA details page for the book entitled *Best Kept Secrets* by author Sandra Brown. The bates numbers for the documents gathered pursuant to the steps described above are AG0000099 to AG0000132.

22. For URL, <https://archive.org/details/witnessbrows00brow>, this is the IA details page for the book entitled *The Witness* by author Sandra Brown. The bates numbers for the documents gathered pursuant to the steps described above are AG0000133 to AG0000156.

23. For URL, <https://archive.org/details/witnesshardcover00sand>, this is the IA details page for the book entitled *The Witness* by author Sandra Brown. The bates numbers for the documents gathered pursuant to the steps described above are AG0000157 to AG0000175.

24. For URL, https://archive.org/details/shorthistoryofne00brys_1, this is the IA details page for the book entitled *A Short History of Nearly Everything: Special Illustrated Edition* by author Bill Bryson. The bates numbers for the documents gathered pursuant to the steps described above are AG0002494 to AG0002522.

25. For URL, <https://archive.org/details/shorthistoryofne00brys>, this is the IA details page for the book entitled *A Short History of Nearly Everything* by author Bill Bryson. The bates numbers for the documents gathered pursuant to the steps described above are AG0002523 to AG0002551.

26. For URL, https://archive.org/details/brideworesize120000cabo_x4s5, this is the IA details page for the book entitled *The Bride Wore Size 12* by author Meg Cabot. The bates numbers for the documents gathered pursuant to the steps described above are AG0001046 to AG0001070.

27. For URL, <https://archive.org/details/enoughaboutyoule00cart>, this is the IA details page for the book entitled *Enough About You, Let's Talk About Me: How to Recognize and Manage the Narcissists in Your Life* by author Dr. Les Carter. The bates numbers for the documents gathered pursuant to the steps described above are AG0001992 to AG0002016.

28. For URL, <https://archive.org/details/chocolatetouch00catl>, this is the IA details page for the book entitled *The Chocolate Touch* by author Patrick Skene Catling. The bates numbers for the documents gathered pursuant to the steps described above are AG0001071 to AG0001095.

29. For URL, <https://archive.org/details/houseonmangostr000cisl>, this is the IA details page for the book entitled *The House on Mango Street* by author Sandra Cisneros. The bates numbers for the documents gathered pursuant to the steps described above are AG0002552 to AG0002576.

30. For URL, <https://archive.org/details/commercialreales0000cont>, this is the IA details page for the book entitled *Commercial Real Estate Investing for Dummies* by authors Peter Conti and Peter Harris. The bates numbers for the documents gathered pursuant to the steps described above are AG0002017 to AG0002039.

31. For URL, <https://archive.org/details/leviathanwakes0000core>, this is the IA details page for the book entitled *Leviathan Wakes* by author James S. A. Corey. The bates numbers for the documents gathered pursuant to the steps described above are AG0000207 to AG0000235.

32. For URL, <https://archive.org/details/calibanswar00core>, this is the IA details page for the book entitled *Caliban's War* by author James S. A. Corey. The bates numbers for the documents gathered pursuant to the steps described above are AG0000176 to AG0000206.

33. For URL, <https://archive.org/details/breathe0000cros>, this is the IA details page for the book entitled *Breathe* by author Sarah Crossan. The bates numbers for the documents gathered pursuant to the steps described above are AG0001096 to AG0001118.

34. For URL, <https://archive.org/details/resist0000cros>, this is the IA details page for the book entitled *Resist* by author Sarah Crossan. The bates numbers for the documents gathered pursuant to the steps described above are AG0001119 to AG0001143.

35. For URL, https://archive.org/details/isbn_9780062020567, this is the IA details page for the book entitled *The Miseducation of Cameron Post* by author Emily M. Danforth. The bates numbers for the documents gathered pursuant to the steps described above are AG0001144 to AG0001168.

36. For URL, <https://archive.org/details/whoisbillgates0000demu>, this is the IA details page for the book entitled *Who Is Bill Gates?* by author Patricia Brennan Demuth. The bates numbers for the documents gathered pursuant to the steps described above are AG0002577 to AG0002599.

37. For URL, https://archive.org/details/isbn_0446617075, this is the IA details page for the book entitled *The Jury Master* by author Robert Dugoni. The bates numbers for the documents gathered pursuant to the steps described above are AG0000236 to AG0000260.

38. For URL, <https://archive.org/details/sportsgeneinside0000epst>, this is the IA details page for the book entitled *The Sports Gene: Inside the Science of Extraordinary Athletic Performance* by author David Epstein. The bates numbers for the documents gathered pursuant to the steps described above are AG0002600 to AG0002622.

39. For URL, https://archive.org/details/foulplay00jane_0, this is the IA details page for the book entitled *Foul Play* by author Janet Evanovich. The bates numbers for the documents gathered pursuant to the steps described above are AG0001169 to AG0001193.

40. For URL, <https://archive.org/details/onlythreequestio0000fish>, this is the IA details page for the book entitled *The Only Three Questions that Still Count: Investing by Knowing What Others Don't* by author Ken Fisher. The bates numbers for the documents gathered pursuant to the steps described above are AG0002040 to AG0002064.

41. For URL, <https://archive.org/details/mylifnextdoor0000fitz>, this is the IA details page for the book entitled *My Life Next Door* by author Huntley Fitzpatrick. The bates numbers for the documents gathered pursuant to the steps described above are AG0002623 to AG0002641.

42. For URL, https://archive.org/details/isbn_9780307588371, this is the IA details page for the book entitled *Gone Girl* by author Gillian Flynn. The bates numbers for the documents gathered pursuant to the steps described above are AG0002642 to AG0002668.

43. For URL, <https://archive.org/details/gonegirlnovel00flyn>, this is the IA details page for the book entitled *Gone Girl* by author Gillian Flynn. The bates numbers for the documents gathered pursuant to the steps described above are AG0002669 to AG0002693.

44. For URL, <https://archive.org/details/ifistaynovel00form>, this is the IA details page for the book entitled *If I Stay* by author Gayle Forman. The bates numbers for the documents gathered pursuant to the steps described above are AG0002694 to AG0002720.

45. For URL, https://archive.org/details/isbn_9780525953081, this is the IA details page for the book entitled *Fear Nothing* by author Lisa Gardner. The bates numbers for the documents gathered pursuant to the steps described above are AG0002721 to AG0002746.

46. For URL, https://archive.org/details/isbn_9780470182307, this is the IA details page for the book entitled *Oil Painting for Dummies* by authors Anita Giddings and Sherry Stone Clifton. The bates numbers for the documents gathered pursuant to the steps described above are AG0002065 to AG0002089.

47. For URL, <https://archive.org/details/eatprayloveonewo00gilb>, this is the IA details page for the book entitled *Eat, Pray, Love: One Woman's Search for Everything Across Italy, India and Indonesia* by author Elizabeth Gilbert. The bates numbers for the documents gathered pursuant to the steps described above are AG0002747 to AG0002775.

48. For URL, https://archive.org/details/davidgoliath00malc_0, this is the IA details page for the book entitled *David and Goliath: Underdogs, Misfits, and the Art of Battling Giants* by author Malcolm Gladwell. The bates numbers for the documents gathered pursuant to the steps described above are AG0000286 to AG0000319.

49. For URL, <https://archive.org/details/whatdogsawothera00glad>, this is the IA details page for the book entitled *What the Dog Saw and Other Adventures* by author Malcolm Gladwell. The bates numbers for the documents gathered pursuant to the steps described above are AG0000346 to AG0000372.

50. For URL, <https://archive.org/details/blinkpowerofthin00glad>, this is the IA details page for the book entitled *Blink: The Power of Thinking Without Thinking* by author Malcolm Gladwell. The bates numbers for the documents gathered pursuant to the steps described above are AG0000261 to AG0000285.

51. For URL, <https://archive.org/details/tippingpointhowl00glad>, this is the IA details page for the book entitled *The Tipping Point: How Little Things Can Make a Big Difference* by author

Malcolm Gladwell. The bates numbers for the documents gathered pursuant to the steps described above are AG0000320 to AG0000345.

52. For URL, <https://archive.org/details/lordofflies0000unse/page/n5/mode/2up>, this is the IA details page for the book entitled *Lord of the Flies* by author William Golding. The bates numbers for the documents gathered pursuant to the steps described above are AG0002776 to AG0002786.

53. For URL, <https://archive.org/details/energybus10rules00gord>, this is the IA details page for the book entitled *The Energy Bus* by author Jon Gordon. The bates numbers for the documents gathered pursuant to the steps described above are AG0002090 to AG0002113.

54. For URL, <https://archive.org/details/escapefrommrlemo0000grab>, this is the IA details page for the book entitled *Escape from Mr. Lemoncello's Library* by author Chris Grabenstein. The bates numbers for the documents gathered pursuant to the steps described above are AG0002787 to AG0002809.

55. For URL, <https://archive.org/details/intelligentinves00grah>, this is the IA details page for the book entitled *The Intelligent Investor* by author Benjamin Graham. The bates numbers for the documents gathered pursuant to the steps described above are AG0001194 to AG0001213.

56. For URL, https://archive.org/details/intelligentinves00grah_1, this is the IA details page for the book entitled *The Intelligent Investor* by author Benjamin Graham. The bates numbers for the documents gathered pursuant to the steps described above are AG0001214 to AG0001235.

57. For URL, <https://archive.org/details/givetakerevoluti0000gran>, this is the IA details page for the book entitled *Give and Take: A Revolutionary Approach to Success* by author Adam Grant. The bates numbers for the documents gathered pursuant to the steps described above are AG0002810 to AG0002832.

58. For URL, https://archive.org/details/isbn_9780142417225, this is the IA details page for the book entitled *Theodore Boone: Kid Lawyer* by author John Grisham. The bates numbers for the documents gathered pursuant to the steps described above are AG0002861 to AG0002884.

59. For URL, https://archive.org/details/isbn_9780525425762, this is the IA details page for the book entitled *Theodore Boone: The Accused* by author John Grisham. The bates numbers for the documents gathered pursuant to the steps described above are AG0002885 to AG0002911.

60. For URL, <https://archive.org/details/redcrayonsstory00hall>, this is the IA details page for the book entitled *Red: A Crayon's Story* by author Michael Hall. The bates numbers for the documents gathered pursuant to the steps described above are AG0001236 to AG0001257.

61. For URL, <https://archive.org/details/whowasjackierobi0000herm>, this is the IA details page for the book entitled *Who Was Jackie Robinson?* by author Gail Herman. The bates numbers for the documents gathered pursuant to the steps described above are AG0002912 to AG0002933.

62. For URL, <https://archive.org/details/scat0000hiao>, this is the IA details page for the book entitled *Scat* by author Carl Hiaasen. The bates numbers for the documents gathered pursuant to the steps described above are AG0002934 to AG0002955.

63. For URL, https://archive.org/details/isbn_9780060838676, this is the IA details page for the book entitled *Their Eyes Were Watching God* by author Zora Neale Hurston. The bates numbers for the documents gathered pursuant to the steps described above are AG0001258 to AG0001285.

64. For URL, <https://archive.org/details/labgirl0000jahr>, this is the IA details page for the book entitled *Lab Girl* by author Hope Jahren. The bates numbers for the documents gathered pursuant to the steps described above are AG0002956 to AG0002980.

65. For URL, <https://archive.org/details/briefhistoryofse0000jame>, this is the IA details page for the book entitled *A Brief History of Seven Killings* by author Marlon James. The bates numbers for the documents gathered pursuant to the steps described above are AG0002981 to AG0003002.

66. For URL, <https://archive.org/details/judgmentcall00janc>, this is the IA details page for the book entitled *Judgment Call* by author J.A. Jance. The bates numbers for the documents gathered pursuant to the steps described above are AG0001311 to AG0001335.

67. For URL, <https://archive.org/details/danceofbonesjpbe0000janc>, this is the IA details page for the book entitled *Dance of the Bones* by author J.A. Jance. The bates numbers for the documents gathered pursuant to the steps described above are AG0001286 to AG0001310.

68. For URL, https://archive.org/details/isbn_9780385738934, this is the IA details page for the book entitled *Fallen* by author Lauren Kate. The bates numbers for the documents gathered pursuant to the steps described above are AG0003006 to AG0003032.

69. For URL, <https://archive.org/details/lilacgirlsnovel0000kell>, this is the IA details page for the book entitled *Lilac Girls* by author Martha Hall Kelly. The bates numbers for the documents gathered pursuant to the steps described above are AG0003033 to AG0003046.

70. For URL, <https://archive.org/details/redeployment0000klay>, this is the IA details page for the book entitled *Redeployment* by author Phil Klay. The bates numbers for the documents gathered pursuant to the steps described above are AG0003047 to AG0003070.

71. For URL, https://archive.org/details/intowild00krak_1, this is the IA details page for the book entitled *Into the Wild* by author Jon Krakauer. The bates numbers for the documents gathered pursuant to the steps described above are AG0003071 to AG0003087.

72. For URL, <https://archive.org/details/spanishallinonef0000kray>, this is the IA details page for the book entitled *Spanish All-In-One for Dummies* by author Cecie Kraynak. The bates

numbers for the documents gathered pursuant to the steps described above are AG0002114 to AG0002138.

73. For URL, <https://archive.org/details/basicphysics00kuhn>, this is the IA details page for the book entitled *Basic Physics* by author Karl F. Kuhn. The bates numbers for the documents gathered pursuant to the steps described above are AG0002139 to AG0002161.

74. For URL, https://archive.org/details/hondo00lamo_2, this is the IA details page for the book entitled *Hondo* by author Louis L'Amour. The bates numbers for the documents gathered pursuant to the steps described above are AG0003088 to AG0003114.

75. For URL, <https://archive.org/details/returnofgeorgewa0000lars>, this is the IA details page for the book entitled *The Return of George Washington* by author Edward J. Larson. The bates numbers for the documents gathered pursuant to the steps described above are AG0001336 to AG0001358.

76. For URL, <https://archive.org/details/deadwakelastcros0000lars>, this is the IA details page for the book entitled *Dead Wake: the Last Crossing of the Lusitania* by author Erik Larson. The bates numbers for the documents gathered pursuant to the steps described above are AG0003115 to AG0003139.

77. For URL, https://archive.org/details/isbn_9780470230657, this is the IA details page for the book entitled *Comparative Religion for Dummies* by authors William P. Lazarus and Mark Sullivan. The bates numbers for the documents gathered pursuant to the steps described above are AG0002162 to AG0002185.

78. For URL, <https://archive.org/details/worldgoneby0000leha>, this is the IA details page for the book entitled *World Gone By* by author Dennis Lehane. The bates numbers for the documents gathered pursuant to the steps described above are AG0001359 to AG0001383.

79. For URL, <https://archive.org/details/gettingnakedbusi00patr>, this is the IA details page for the book entitled *Getting Naked: A Business Fable About Shedding the Three Fears that Sabotage Client Loyalty* by author Patrick Lencioni. The bates numbers for the documents gathered pursuant to the steps described above are AG0002186 to AG0002207.

80. For URL, https://archive.org/details/overcomingfivedy00lenc_0, this is the IA details page for the book entitled *Overcoming the Five Dysfunctions of a Team* by author Patrick Lencioni. The bates numbers for the documents gathered pursuant to the steps described above are AG0002208 to AG0002232.

81. For URL, <https://archive.org/details/advantagewhyorga0000lenc>, this is the IA details page for the book entitled *The Advantage: Why Organizational Health Trumps Everything Else in Business* by author Patrick Lencioni. The bates numbers for the documents gathered pursuant to the steps described above are AG0002233 to AG0002255.

82. For URL, <https://archive.org/details/fivedysfunctions00lenc>, this is the IA details page for the book entitled *The Five Dysfunctions of a Team: A Leadership Fable* by author Patrick Lencioni. The bates numbers for the documents gathered pursuant to the steps described above are AG0002256 to AG0002282.

83. For URL, <https://archive.org/details/threesignsofmise00lenc>, this is, this is the IA details page for the book entitled *The Three Signs of a Miserable Job: A Fable for Managers (and Their Employees)* by author Patrick Lencioni. The bates numbers for the documents gathered pursuant to the steps described above are AG0002283 to AG0002307.

84. For URL, <https://archive.org/details/allpresidentstwom0000levi>, this is the IA details page for the book entitled *All the President's Women: Donald Trump and the Making of a Predator* by

authors Barry Levine and Monique El-Faizy. The bates numbers for the documents gathered pursuant to the steps described above are AG0000373 to AG0000399.

85. For URL, https://archive.org/details/lionwitchwardrob00lewi_2, this is the IA details page for the book entitled *The Lion, The Witch and the Wardrobe* by author C.S. Lewis. The bates numbers for the documents gathered pursuant to the steps described above are AG0001384 to AG0001424.

86. For URL, <https://archive.org/details/lionwitchwardrob0000lewi>, this is the IA details page for the book entitled *The Lion, The Witch and the Wardrobe* by author C.S. Lewis. The bates numbers for the documents gathered pursuant to the steps described above are AG0001425 to AG0001447.

87. For URL, <https://archive.org/details/magiciansnephew01lewi>, this is the IA details page for the book entitled *The Magician's Nephew* by author C.S. Lewis. The bates numbers for the documents gathered pursuant to the steps described above are AG0001448 to AG0001481.

88. For URL, <https://archive.org/details/dancewithdragons00mart>, this is the IA details page for the book entitled *A Dance with Dragons* by author George R.R. Martin. The bates numbers for the documents gathered pursuant to the steps described above are AG0003171 to AG0003197.

89. For URL, https://archive.org/details/unset0000unse_f0a5, this is the IA details page for the book entitled *The Road* by author Cormac McCarthy. The bates numbers for the documents gathered pursuant to the steps described above are AG0003198 to AG0003224.

90. For URL, <https://archive.org/details/bookwhispererawa00mill>, this is the IA details page for the book entitled *The Book Whisperer* by author Donalyn Miller. The bates numbers for the documents gathered pursuant to the steps described above are AG0002308 to AG0002330.

91. For URL, <https://archive.org/details/nightcircusnovel00morg>, this is the IA details page for the book entitled *The Night Circus* by author Erin Morgenstern. The bates numbers for the documents gathered pursuant to the steps described above are AG0003225 to AG0003251.

92. For URL, https://archive.org/details/songofsolomon0000morr_har5, this is the IA details page for the book entitled *Song of Solomon* by author Toni Morrison. The bates numbers for the documents gathered pursuant to the steps described above are AG0003252 to AG0003274.

93. For URL, https://archive.org/details/songofsolomon00morr_0, this is the IA details page for the book entitled *Song of Solomon* by author Toni Morrison. The bates numbers for the documents gathered pursuant to the steps described above are AG0003275 to AG0003303.

94. For URL, <https://archive.org/details/bluesteyenovel0000morr>, this is the IA details page for the book entitled *The Bluest Eye* by author Toni Morrison. The bates numbers for the documents gathered pursuant to the steps described above are AG0003304 to AG0003326.

95. For URL, https://archive.org/details/bluesteye00morr_1, this is the IA details page for the book entitled *The Bluest Eye* by author Toni Morrison. The bates numbers for the documents gathered pursuant to the steps described above are AG0003327 to AG0003355.

96. For URL, <https://archive.org/details/howidiscoveredpo0000nels>, this is the IA details page for the book entitled *How I Discovered Poetry* by author Marilyn Nelson. The bates numbers for the documents gathered pursuant to the steps described above are AG0003356 to AG0003380.

97. For URL, <https://archive.org/details/fancynancysupers0000ocon>, this is the IA details page for the book entitled *Fancy Nancy: Super Secret Surprise Party* by author Jane O'Connor. The bates numbers for the documents gathered pursuant to the steps described above are AG0001482 to AG0001499.

98. For URL, <https://archive.org/details/fancynancytooman0000ocon>, this is the IA details page for the book entitled *Fancy Nancy: Too Many Tutus* by author Jane O'Connor. The bates numbers for the documents gathered pursuant to the steps described above are AG0001500 to AG0001522.

99. For URL, <https://archive.org/details/letyourlifespeak2000palm>, this is the IA details page for the book entitled *Let Your Life Speak: Listening to the Voice of Vocation* by author Parker J. Palmer. The bates numbers for the documents gathered pursuant to the steps described above are AG0002331 to AG0002353.

100. For URL, <https://archive.org/details/juniebfirstbosso00park>, this is the IA details page for the book entitled *Junie B., First Grader: Boss of Lunch* by author Barbara Park. The bates numbers for the documents gathered pursuant to the steps described above are AG0003381 to AG0003405.

101. For URL, <https://archive.org/details/commonwealthnove0000patc>, this is the IA details page for the book entitled *Commonwealth* by author Ann Patchett. The bates numbers for the documents gathered pursuant to the steps described above are AG0001523 to AG0001545.

102. For URL, https://archive.org/details/isbn_9780316101691, this is the IA details page for the book entitled *Middle School, The Worst Years of My Life* by author James Patterson. The bates numbers for the documents gathered pursuant to the steps described above are AG0000489 to AG0000525.

103. For URL, <https://archive.org/details/middleschoolwors0000patt>, this is the IA details page for the book entitled *Middle School, The Worst Years of my Life* by author James Patterson. The bates numbers for the documents gathered pursuant to the steps described above are AG0000526 and AG0000554.

104. For URL, <https://archive.org/details/ifunny0000patt>, this is the IA details page for the book entitled *I Funny: A Middle School Story* by authors James Patterson and Chris Grabenstein. The bates numbers for the documents gathered pursuant to the steps described above are AG0000400 to AG0000434.

105. For URL, https://archive.org/details/ifunny0000patt_w7e5, this is the IA details page for the book entitled *I Funny: A Middle School Story* by authors James Patterson and Chris Grabenstein. The bates numbers for the documents gathered pursuant to the steps described above are AG0000435 to AG0000463.

106. For URL, https://archive.org/details/isbn_9780316405348, this is the IA details page for the book entitled *Invisible* by author James Patterson. The bates numbers for the documents gathered pursuant to the steps described above are AG0000464 to AG0000488.

107. For URL, https://archive.org/details/isbn_9780062086983/mode/2up, this is the IA details page for the book entitled *Big Nate: Genius Mode* by author Lincoln Peirce. The bates numbers for the documents gathered pursuant to the steps described above are AG0001546 to AG0001570.

108. For URL, <https://archive.org/details/bignategoesforbr00peir>, this is the IA details page for the book entitled *Big Nate: Goes for Broke* by author Lincoln Peirce. The bates numbers for the documents gathered pursuant to the steps described above are AG0001571 to AG0001595.

109. For URL, https://archive.org/details/isbn_9780062087003, this is the IA details page for the book entitled *Big Nate: Mr. Popularity* by author Lincoln Peirce. The bates numbers for the documents gathered pursuant to the steps described above are AG0001596 to AG0001620.

110. For URL, <https://archive.org/details/betterangelsofou0000pink>, this is the IA details page for the book entitled *The Better Angels of Our Nature: Why Violence has Declined* by

author Steven Pinker. The bates numbers for the documents gathered pursuant to the steps described above are AG0003406 to AG0003430.

111. For URL, <https://archive.org/details/belljarps00sylv/page/n9/mode/2up>, this is the IA details page for the book entitled *The Bell Jar* by author Sylvia Plath. The bates numbers for the documents gathered pursuant to the steps described above are AG0001621 to AG0001653.

112. For URL, https://archive.org/details/nightwatch00prat_0, this is the IA details page for the book entitled *Night Watch* by author Terry Pratchett. The bates numbers for the documents gathered pursuant to the steps described above are AG0001654 to AG0001680.

113. For URL, <https://archive.org/details/defiance00redw>, this is the IA details page for the book entitled *Defiance* by author C.J. Redwine. The bates numbers for the documents gathered pursuant to the steps described above are AG0001681 to AG0001704.

114. For URL, <https://archive.org/details/makingthinkingvi0000unse>, this is the IA details page for the book entitled *Making Thinking Visible: How to Promote Engagement, Understanding, and Independence for All Learners* by authors Ron Ritchhart, Mark Church and Karin Morrison. The bates numbers for the documents gathered pursuant to the steps described above are AG0002354 to AG0002370.

115. For URL, <https://archive.org/details/fallingupwardspi00rohr>, this is the IA details page for the book entitled *Falling Upward: A Spirituality for the Two Halves of Life* by author Richard Rohr. The bates numbers for the documents gathered pursuant to the steps described above are AG0002371 to AG0002394.

116. For URL, <https://archive.org/details/catcherinrye0000sali>, this is the IA details page for the book entitled *The Catcher in the Rye* by author J.D. Salinger. The bates numbers for the documents gathered pursuant to the steps described above are AG0000645 to AG0000667.

117. For URL, <https://archive.org/details/ninestories0000sali>, this is the IA details page for the book entitled *Nine Stories* by author J.D. Salinger. The bates numbers for the documents gathered pursuant to the steps described above are AG0000578 and AG0000596.

118. For URL, <https://archive.org/details/frannyzooey00salirich/mode/2up>, this is the IA details page for the book entitled *Franny and Zooey* by author J.D. Salinger. The bates numbers for the documents gathered pursuant to the steps described above are AG0000555 and AG0000577.

119. For URL, <https://archive.org/details/raisehighroofbea00sali/mode/2up>, this is the IA details page for the book entitled *Raise High the Roof Beam, Carpenters and Seymour: An Introduction* by author J.D. Salinger. The bates numbers for the documents gathered pursuant to the steps described above are AG0000597 and AG0000620.

120. For URL, https://archive.org/details/raisehighroofbea0000sali_19y4/mode/2up, this is the IA details page for the book entitled *Raise High the Roof Beam, Carpenters and Seymour: An Introduction* by author J.D. Salinger. The bates numbers for the documents gathered pursuant to the steps described above are AG0000621 to AG0000644.

121. For URL, <https://archive.org/details/phantomprey00sand>, this is the IA details page for the book entitled *Phantom Prey* by author John Sandford. The bates numbers for the documents gathered pursuant to the steps described above are AG0003431 to AG0003457.

122. For URL, <https://archive.org/details/agesstagesparent00char/mode/2up>, this is the IA details page for the book entitled *Ages & Stages: A Parent's Guide to Normal Childhood Development* by authors Dr. Charles E. Schaefer and Theresa Foy DiGeronimo. The bates numbers for the documents gathered pursuant to the steps described above are AG0002395 to AG0002419.

123. For URL, <https://archive.org/details/extraordinarymea0000schn>, this is the IA details page for the book entitled *Extraordinary Means* by author Robyn Schneider. The bates numbers for the documents gathered pursuant to the steps described above are AG0001705 to AG0001729.

124. For URL, <https://archive.org/details/todaywillbediffe0000semp>, this is the IA details page for the book entitled *Today Will Be Different* by author Maria Semple. The bates numbers for the documents gathered pursuant to the steps described above are AG0000668 to AG0000690.

125. For URL, <https://archive.org/details/neurotribeslegac0000silb>, this is the IA details page for the book entitled *Neurotribes: the Legacy of Autism and the Future of Neurodiversity* by author Steve Silberman. The bates numbers for the documents gathered pursuant to the steps described above are AG0003458 to AG0003480.

126. For URL, <https://archive.org/details/whocouldthatbeat00snic>, this is the IA details page for the book entitled “*Who Could That Be at This Hour?*” by author Lemony Snicket. The bates numbers for the documents gathered pursuant to the steps described above are AG0000726 to AG0000752.

127. For URL, https://archive.org/details/isbn_9780316123051, this is the IA details page for the book entitled “*When Did You See Her Last?*” by author Lemony Snicket. The bates numbers for the documents gathered pursuant to the steps described above are AG0000691 to AG0000725.

128. For URL, https://archive.org/details/isbn_9780316176194, this is the IA details page for the book entitled *The Extraordinary Education of Nicholas Benedict* by author Trenton

Lee Stewart. The bates numbers for the documents gathered pursuant to the steps described above are AG0000753 to AG0000779.

129. For URL, <https://archive.org/details/mysteriousbenedi00stew>, this is the IA details page for the book entitled *The Mysterious Benedict Society* by author Trenton Lee Stewart. The bates numbers for the documents gathered pursuant to the steps described above are AG0000780 to AG0000813.

130. For URL, <https://archive.org/details/mysteriousbenedi00tren>, this is the IA details page for the book entitled *The Mysterious Benedict Society* by author Trenton Lee Stewart. The bates numbers for the documents gathered pursuant to the steps described above are AG0000814 to AG0000847.

131. For URL, https://archive.org/details/mysteriousbenedi00stew_0, this is the IA details page for the book entitled *The Mysterious Benedict Society and the Perilous Journey* by author Trenton Lee Stewart. The bates numbers for the documents gathered pursuant to the steps described above are AG0000848 to AG0000876.

132. For URL, https://archive.org/details/isbn_9780316036733, this is the IA details page for the book entitled *The Mysterious Benedict Society and the Perilous Journey* by author Trenton Lee Stewart. The bates numbers for the documents gathered pursuant to the steps described above are AG0000877 to AG0000904.

133. For URL, <https://archive.org/details/thanksforfeedbac0000ston>, this is the IA details page for the book entitled *Thanks for the Feedback: the Science and Art of Receiving Feedback (Even When it is Off-Base, Unfair, Poorly Delivered, and Frankly, You're Not in the Mood)* by authors Douglas Stone and Sheila Heen. The bates numbers for the documents gathered pursuant to the steps described above are AG0003481 to AG0003503.

134. For URL, <https://archive.org/details/burgessboysnovel00eliz>, this is the IA details page for the book entitled *The Burgess Boys* by author Elizabeth Strout. The bates numbers for the documents gathered pursuant to the steps described above are AG0003504 to AG0003528.

135. For URL, https://archive.org/details/isbn_9781595148032, this is the IA details page for the book entitled *An Ember in the Ashes* by author Sabaa Tahir. The bates numbers for the documents gathered pursuant to the steps described above are AG0003529 to AG0003549.

136. For URL, https://archive.org/details/threetimeslucky0000turn_e7y3, this is the IA details page for the book entitled *Three Times Lucky* by author Sheila Turnage. The bates numbers for the documents gathered pursuant to the steps described above are AG0003550 to AG0003574.

137. For URL, https://archive.org/details/isbn_9780143127741, this is the IA details page for the book entitled *The Body Keeps the Score: Brain, Mind, and Body in the Healing of Trauma* by author Bessel van der Kolk. The bates numbers for the documents gathered pursuant to the steps described above are AG0003575 to AG0003598.

138. For URL, <https://archive.org/details/openheart0000wies>, this is the IA details page for the book entitled *Open Heart* by author Elie Wiesel. The bates numbers for the documents gathered pursuant to the steps described above are AG0003599 to AG0003623.

139. For URL, https://archive.org/details/littlehouseinbig00wild_6, this is the IA details page for the book entitled *Little House in the Big Woods* by author Laura Ingalls Wilder. The bates numbers for the documents gathered pursuant to the steps described above are AG0001752 to AG0001781.

140. For URL, <https://archive.org/details/littlehouseonpra0000unse/mode/2up>, this is the IA details page for the book entitled *Little House on the Prairie* by author Laura Ingalls Wilder.

The bates numbers for the documents gathered pursuant to the steps described above are AG0001782 to AG0001802.

141. For URL, <https://archive.org/details/littlehouseonpra00wild/mode/2up>, this is the IA details page for the book entitled *Little House on the Prairie* by author Laura Ingalls Wilder. The bates numbers for the documents gathered pursuant to the steps described above are AG0001803 to AG0001831.

142. For URL, https://archive.org/details/littlehouseonpra00wild_0/mode/2up, this is the IA details page for the book entitled *Little House on the Prairie* by author Laura Ingalls Wilder. The bates numbers for the documents gathered pursuant to the steps described above are AG0001832 to AG0001858.

143. For URL, https://archive.org/details/littlehouseonpra00wild_1, this is the IA details page for the book entitled *Little House on the Prairie* by author Laura Ingalls Wilder. The bates numbers for the documents gathered pursuant to the steps described above are AG0001859 to AG0001887.

144. For URL, https://archive.org/details/littlehouseonpra00wild_3/mode/2up, this is the IA details page for the book entitled *Little House on the Prairie* by author Laura Ingalls Wilder. The bates numbers for the documents gathered pursuant to the steps described above are AG0001888 to AG0001916.

145. For URL, <https://archive.org/details/farmerboy00wild/mode/2up>, this is the IA details page for the book entitled *Farmer Boy* by author Laura Ingalls Wilder. The bates numbers for the documents gathered pursuant to the steps described above are AG0001730 to AG0001751.

146. For URL, <https://archive.org/details/dangerousplaceno0000wins>, this is the IA details page for the book entitled *A Dangerous Place* by author Jacqueline Winspear. The bates

numbers for the documents gathered pursuant to the steps described above are AG0001917 to AG0001939.

147. For URL, <https://archive.org/details/journeytomunichn0000wins>, this is the IA details page for the book entitled *Journey to Munich* by author Jacqueline Winspear. The bates numbers for the documents gathered pursuant to the steps described above are AG0001966 to AG0001990.

148. For URL, <https://archive.org/details/elegyforeddie00wins/page/20>, this is the IA details page for the book entitled *Elegy for Eddie* by author Jacqueline Winspear. The bates numbers for the documents gathered pursuant to the steps described above are AG0001940 to AG0001965.

149. For URL, https://archive.org/details/isbn_9780470496374, this is the IA details page for the book entitled *Wind Power for Dummies* by author Ian Woofenden. The bates numbers for the documents gathered pursuant to the steps described above are AG0002420 to AG0002444.

150. For URL, <https://archive.org/details/windsofwarnovel00wouk>, this is the IA details page for the book entitled *The Winds of War* by author Herman Wouk. The bates numbers for the documents gathered pursuant to the steps described above are AG0000928 to AG0000964.

151. For URL, <https://archive.org/details/cainemutiny00wouk>, this is the IA details page for the book entitled *The Caine Mutiny: A Novel of World War II* by author Herman Wouk. The bates numbers for the documents gathered pursuant to the steps described above are AG0000905 to AG0000927.

152. For URL, <https://archive.org/details/manwhosolvedmark0000zuck>, this is the IA details page for the book entitled *The Man Who Solved the Market* by author Gregory Zuckerman.

The bates numbers for the documents gathered pursuant to the steps described above are AG0003624 to AG0003639.

Exceptions

153. With respect to the process described above, a handful of pages were unavailable.

154. For the URLs <https://archive.org/details/lordofflies0000unse> and <https://archive.org/details/witnesshardcover00sand>, although I was able to download the digital book, I was unable to access a corresponding Open Library webpage. As such, I did not capture the corresponding Open Library webpage.

155. For the URL <https://archive.org/details/mylifnextdoor0000fitz>, although I was able to download the digital book, there was no rights page to capture. As such, I did not capture the rights page.

156. For the URL <https://archive.org/details/houseonmangostr000cisin>, although I was able to download the digital book, there was no digitization page to capture. As such, I did not capture the digitization page.

157. For the URLs <https://archive.org/details/lordofflies0000unse>, https://archive.org/details/intowild00krak_1, <https://archive.org/details/manwhosolvedmark0000zuck>, <https://archive.org/details/makingthinkingvi0000unse>, and <https://archive.org/details/lilacgirlsnovel0000kell>, I was waitlisted to “Borrow” a full copy of the work. As a result, I did not “Borrow” the work and did not download the work to Adobe Digital Editions.

158. For the URLs <https://archive.org/details/energybus10rules00gord> and <https://archive.org/details/bookwhispererawa00mill>, I was only able to download the digital book in the ePUB format, as the PDF format was not available. I was able to capture the full series of pages from the downloaded ePUB file.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 7th day of February, 2022.


Tracy Offner